

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

STATE OF NEW JERSEY,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF TRANSPORTATION, FEDERAL HIGHWAY ADMINISTRATION, SHAILEN BHATT, in his official capacity as Administrator of the Federal Highway Administration, and RICHARD J. MARQUIS, in his official capacity as Division Administrator of the New York Division of the Federal Highway Administration,

Defendants.

Hon. Brian R. Martinotti

Civ. No. 2:23-cv-03885-BRM-LDW

**APPLICATION FOR ADMISSION *PRO  
HAC VICE* OF ELIZABETH KNAUER  
PURSUANT TO D.N.J. L.CIV.R. 101**

Proposed Intervenor-Defendants the Metropolitan Transportation Authority (the “MTA”) and the Triborough Bridge and Tunnel Authority (“TBTA”), by their undersigned counsel, hereby move this Court for an entry of an Order allowing the admission *pro hac vice* of:

Elizabeth Knauer, Esq.  
Sive, Paget & Riesel, P.C.  
560 Lexington Avenue, 15th Floor  
New York, NY 10022

**PLEASE TAKE FURTHER NOTICE** that the undersigned certifies as follows:

1. I will comply with Local Civil Rule 101.1(c) and will be held responsible for the conduct of Elizabeth Knauer, Esq.
2. I will ensure that Elizabeth Knauer, Esq. complies with Local Civil Rule 101.1(c).

3. I or another attorney admitted to practice before the United States District Court for the District of New Jersey will sign all pleadings, briefs and other papers filed with the Court.

4. I or another attorney admitted to practice before the United States District Court for the District of New Jersey will make all Court appearances required by the Court and the Local Rules.

**PLEASE TAKE FURTHER NOTICE** that the MTA and TBTA will rely upon the accompanying declaration of Elizabeth Knauer, Esq. in support of this motion and that no brief is necessary as this motion raises no issue of law and the relief sought is within the Court's discretion.

Respectfully submitted this 6th day of October 2023.

/s/ Daniel Chorost

Daniel Chorost  
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*Counsel for Proposed Intervenor-  
Defendants the Metropolitan  
Transportation Authority and the  
Triborough Bridge and Tunnel Authority*